



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

August 27, 2013

Garry Griffith, P.E.  
Georgia-Pacific LLC (GP)  
951 County Street  
Milan, Michigan 48160-9610



Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment Time-Critical Removal Action (TCRA)

Dear Mr. Griffith,

As you know, on June 11, 2013, EPA (accompanied by Georgia-Pacific LLC (GP), Michigan Department of Environmental Quality, Michigan Department of Natural Resources (MDNR) Michigan Attorney General's Office, and the U.S. Fish and Wildlife) inspected the river banks and floodplains in the Plainwell Impoundment Area of the above referenced Superfund Site. This letter documents the findings of that inspection.

During the inspection, EPA determined there was no active or threatened catastrophic failure of the river banks in the removal areas (RAs). EPA, however, observed erosion and evidence of threat of erosion in the following RAs (see enclosed map). Such erosion and evidence of threat of erosion, if not addressed over the long term may result in a release of PCB containing material into the Kalamazoo River:

- a) RA 2A has exposed residual materials on the bank; erosion is noted on the downstream 1/3 of RA 2A;
- b) There is an eroded shoreline gap between 1A and 2A and exposed residual material was observed;
- c) RA 10A, as in past inspections, continues to erode and expose residual material along its banks.
- d) Residual materials are exposed on the banks in some areas of RA 7, RA 8, and RA 9b. The river channel is unstable in these areas. Therefore these areas, although previously armored with coir log and rock, need additional rock armoring up to the full elevation of the bank. To address these concerns, GP has committed to planting live willow in the buffer zone and landward of the existing rock bank armoring to further increase the density and depth of roots and increase the soil holding capability of the bank. We understand this work will be completed in the fall of 2013.

e) A portion of the the rock armoring that GP installed in 2012 at RAs 4A and 6B is crumbling. Also, EPA found that some of the willow stakes at 6B had not survived. GP indicated that it will be replanting willow stakes in RA-6B in the fall of 2013. GP has reported to EPA that the crumbling of the rock (sandstone) is typical in the first freeze thaw cycle and that no further crumbling is expected in future years. If further crumbling occurs EPA may require installation of additional rock armoring.

We have completed our review of the 2012 Bank Conditions Monitoring Report and Addendums 1 and 2 thereto as well as GP's response to both EPA's and MDEQ's comments. We conclude that as the aforementioned reports pertain to the Plainwell Impoundment, GP has satisfied EPA's concerns and at this time, EPA requires no additional work from GP related to the 2007 TCRA.

Please feel free to contact me should you have any questions.

Sincerely,



Ramon Mendoza  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Mail Code SE-5J  
Chicago, Illinois 60604

CC: P. Buckholtz, MDEQ  
J. Alfano, MDEQ  
S. Hanshue, MDNR

Enclosure: Map of Removal Areas where EPA observed erosion and evidence of threat of erosion.

**LEGEND**

- PRE-CONSTRUCTION DAM-AT MEDIAN WATER LINE (APPENDIX)
- STATION POINT (IN HUNDREDS OF FEET)
- STANDARDIZED BANK CENTERLINE AND STATION LINE
- HIGH BANK EROSION HAZARD
- MODERATE BANK EROSION HAZARD
- LOW BANK EROSION HAZARD
- VERY LOW BANK EROSION HAZARD

**NOTES**

- SEE FIGURE 2 FOR BAREMAP INFORMATION AND TRAILSET LOCATIONS.
- BANK EROSION HAZARD RECALCULATED USING BANK HEIGHTS INTERPOLATED FROM THE CLOSEST SURVEYED BANK.

**TITLE BLOCK:**

GEORGIA-PACIFIC LLC  
 ALLIED PAPERS INC. PORTAGE OREDO  
 KALAMAZOO RIVER SUPERFUND SITE  
 FORMER PLAINWELL IMPOUNDMENT AND PLAINWELL NO. 1  
 DAM AREA 2012 BANK CONDITIONS MONITORING REPORT  
 FORMER PLAINWELL IMPOUNDMENT  
 BANK EROSION HAZARD RATING  
 SUMMARY

**ARCADIS**

**FIGURE 12**

Diagram of a beam scale. A horizontal beam is shown with a vertical weight hanger attached to its center. The beam is supported by a fulcrum. The weight hanger is labeled 'WEIGHT HANGER'.

## FORMER PLAINWELL IMPOUNDMENT BANK EROSION HAZARD RATING SUMMARY


**ARCADIS**

**12**

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